

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

MERRY F. SHANE, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

 \mathbf{V}_i

AMCORE FINANCIAL, INC., JOHN A. HALBROOK, FREDERICK D. HAY, STEPHEN S. ROGERS, JOHN W. GLEESON, WILLIAM R. MCMANAMAN, JACK D. WARD, PAULA A. BAUER, PAUL DONOVAN, TERESA IGLESIAS-SOLOMON, JUDITH CARRÈ SUTFIN, DONALD H. WILSON, and DOES 1-20.

Defendants.

Civil Action No.: 3:10-cv-50089
(Consolidated with Civil Action No.
3:10-cv-50132)

**PLAINTIFFS' UNOPPOSED MOTION TO ESTABLISH
A PRELIMINARY SCHEDULE OF PROCEEDINGS
FOR CONSOLIDATED MATTER**

Plaintiffs Merry F. Shane, Michelle Kretsinger and Keith Krestinger (“Plaintiffs”) respectfully submit this motion to establish a preliminary schedule of proceedings in the above-captioned consolidated matter, including the filing of any motion for appointment of interim class counsel pursuant to FED. R. CIV. P. 23(g). In support of their motion, Plaintiffs state as follows:

1. On June 30, 2010, in a minute entry, the Court consolidated *Kretsinger, et al. v. Amcore Financial, Inc., et al.*, Case No. 3:10-cv-50132-FJK(PMM) with *Shane v. Amcore Financial, Inc., et al.*, Case No. 3:10-cv-50089-FJK(PMM) for all purposes pursuant to FED. R. CIV. P. 42(a) with the consolidated matter proceeding under the *Shane* docket.

2. Further, per the June 30, 2010 minute entry, all pretrial scheduling matters were referred to Magistrate Judge P. Michael Mahoney.

3. Plaintiffs respectfully request the establishment of a briefing schedule for certain pretrial procedures. In particular, in the interest of promoting efficient litigation of this consolidated matter, Plaintiffs respectfully request that this Court order and endorse the following schedule for pretrial procedures, such that:

(a) Any motion for appointment of interim class counsel for the consolidated matter pursuant to Fed. R. Civ. P. 23(g) shall be filed within twenty-one (21) days of the entry of an order granting this unopposed motion; any opposition to the Rule 23(g) motion shall be filed twenty-one (21) days from the filing and service of the Rule 23(g) motion; and any replies in support of the Rule 23(g) motion shall be filed within fourteen (14) days of the filing and service of the opposition to the Rule 23(g) motion;

(b) Plaintiffs shall file their Consolidated Complaint within sixty (60) days after this Court's determination regarding the Fed. R. Civ. P. 23(g) motion;

(c) Defendants shall have forty-five (45) days from the filing and service of the Consolidated Complaint to move, answer or otherwise respond;

(d) Plaintiffs will have thirty (30) days to oppose any dispositive motion brought by Defendants directed at the Consolidated Complaint; and

(e) Defendants will have thirty (30) days to file and serve any reply.

4. This motion is made in good faith and not for any dilatory purpose, and the parties will not be prejudiced by the granting of this motion. Defendants do not oppose this motion.

Dated: July 8, 2010

Respectfully submitted,

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